F.C.C.

Dear Sirs,
As a licensed pilot and airplane owner I vehemently oppose the proposal to prohibit the existing use if the 121.5 MHZ emergency locator system.
Eliminating 121.5 MHz ELTs would cost myself and other pilots an estimated $1,000 to $2,000 to switch to the 406 MHz ELT, and cost the industry as a whole an estimated $300 million to $500 million, according to the FAA. This at a time when we are actively trying to save our sport from becoming so expensive the average man cant partake of this simple pleasure.

It would also negatively affect the future of recruiting new young pilots. If every flying club and low cost flying school is forced to remove a device with a proven track record and is functioning properly, to install a device that is so expensive as to be prohibitive, that school or club will reduce their inventory (loss of money) and raise their prices (less obtainable to the young, budget conscious)
That's a high cost to impose on the industry for a switch when there has been no study or analysis provided showing increased safety benefits. The 406 MHz ELT is only slightly more likely to be set off by the impact of an accident than a 121.5 MHz ELT. While the 406 MHz ELT transmits GPS coordinates, it also transmits a signal over 121.5 MHz. Because neither ELT is 100-percent reliable, many pilots are flying with other tracking devices that can be set off while in the air.
The out-of-pocket cost to switch to a 406 MHz ELT to aircraft owners would cut deep into already limited personal funds available to maintain aircraft or equip them with other safety-enhancing products like GPS, moving maps, or angle of attack indicators, or purchase personal tracking devices.
"The money that the FCC mandate would cost could be better used for maintenance, other needed equipment, or a few precious hours of flying time," AOPA Vice President of Regulatory Affairs Rob Hackman said.
Impact of ban counter to FCC's stated goal
The FCC state's that its proposed ban would keep the commission's rules up to date, accommodate new technologies, facilitate the efficient and effective use of the aeronautical spectrum, avoid unnecessary regulation, and enhance the safety of flight.
"In reality, the ban would do just the opposite of what the FCC claims," Hackman said.
The proposal would quickly become outdated and freeze GA's use of ELTs at 2013 technology levels. Additionally, the FAA's mandate for pilots to equip their aircraft with ADS-B Out by 2020 make the proposal moot because the technology will provide an aircraft's last known position (potentially to within one second depending on aircraft speed) and provide air traffic control the aircraft's registration number.
The FCC also would deter the use of new technologies, not accommodate them. The cost to switch to the 406 MHz ELT would limit pilots' funds and inclination to purchase other devices, such as emergency position indicating radio beacons (EPIRBs). According to the National Oceanic and Atmospheric Administration, more than 9,600 EPIRBs are being carried by pilots. Even more use

personal locator beacons, cellphones with GPS tracking, and commercial tracking devices that provide the same or better tracking than 406 MHz ELTs. These devices can be activated before an emergency landing or ditching, ensuring the signal has gone off.

AOPA strongly opposes any proposal that would promote reliance on one specific technology, as in this case, the 406 MHz ELT. The association believes aircraft owners are the best to decide—based on their type of operations and the terrain they overfly—what kind of emergency locator equipment to carry onboard the aircraft.

The ban would do nothing to make the use of the aeronautical spectrum more efficient because 121.5 MHz would remain the emergency broadcast frequency for pilots.

As for avoiding unnecessary regulation, “the proposal itself is unnecessary. Making it a regulation would be absurd,” Hackman said. “It’s also would run counter to existing statutes. Congress has that deemed the 121.5 MHz ELT meets the national statutory requirement of having an ELT onboard an aircraft.”

Multi-year effort

The debate about whether to ban 121.5 MHz ELTs and mandate the switch to 406 MHz ELTs escalated when satellites stopped monitoring the frequency in February 2009. Pilots and air traffic controllers, however, continue to monitor the frequency. For years, AOPA has advocated against any proposals to mandate switching to 406 MHz units, and has worked with the industry and FAA to successfully prevent the FCC from imposing a ban on the use of 121.5 MHz ELTs in 2011.

“The FAA is the authority for regulations affecting aviation and in this case is the correct agency to determine the outcome of this issue,” Hackman said. “The FCC should still defer to the FAA on issues of aviation safety.

Sincerely,

Ed Adams
San Diego, Ca.